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Author: "Richard S. DeBuys" <rdebuys@wellcontrol.com> at ~smtp
Date: 7/16/99 4:16 PM
Priority: Normal
TO: Wilbon Rhome at ~MMS-Herndon-OCS2
Subject: RE: Well Control Table

RULES PROCESSING TEAM

JUL 17 1999

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Wilbon,

Please accept the following as another comment from WCS on the proposed changes to Subpart O. This has just been brought (this Friday afternoon) to our attention, and we felt it urgent enough to get it to you to add to the comments. This may be an important point and must be addressed. It could lead to massive revisions of other MMS documentations. The comment is:

Has MMS reviewed other CFRs that may be impacted and have to be modified if the present Subpart O changes?

A client of WCS brought up such a concern that needs to be considered.

Under 46 CFR, Part 1-40 page 10.468, to be issued an Offshore Installation Manager (OIM) license you must have "a MMS well control certificate from an accredited school". Without the certificate, a requirement cannot be met and new OIM licenses cannot be obtained. This now appearing to also become a conflict between two governmental agencies.

I am not an expert in the CFRs but would question that if one was found that relies on a MMS certificate from an accredited school, there will probably be others.

Thanks,

Richard S. DeBuys